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Attorneys for WAYMO LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

vs.

UBER TECHNOLOGIES, INC.;
OTTOMOTTO LLC; OTTO TRUCKING
LLC,

Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF FELIPE
CORREDOR IN SUPPORT OF
DEFENDANT OTTO TRUCKING LLC'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL PORTIONS OF ITS
MOTION TO EXCLUDE REPORT AND
TESTIMONY OF DR. LAMBERTUS
HESSELINK AND WAYMO'S
OPPOSITION THERETO**

1 I, Felipe Corredor, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,
4 LLP, counsel for the Plaintiff Waymo LLC ("Waymo"). I have personal knowledge of the matters set
5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Defendant Otto Trucking LLC's Administrative
7 Motion to File Under Seal Portions of Its Motion to Exclude Report and Testimony of Dr. Lambertus
8 Hesselink and Waymo's Opposition Thereto (the "Administrative Motion"). The Administrative
9 Motion seeks an order sealing highlighted portions of Otto Trucking's Motion to Exclude Report and
10 Testimony of Dr. Lambertus Hesselink ("Otto Trucking's Motion") and of Plaintiff Waymo LLC's
11 Opposition to Defendant Otto Trucking's Motion to Exclude Report and Testimony of Dr. Lambertus
12 Hesselink ("Waymo's Opposition"), as well as the entirety of Exhibits 1-3 to the Lin Declaration and
13 Exhibit 2 to the Corredor Declaration.

14 3. The green highlighted portions of Otto Trucking's Motion, as well as the entirety of
15 Exhibits 1-2, contain or refer to trade secret information, which Waymo seeks to seal.

16 4. Otto Trucking's Motion (portions highlighted in green) and Exhibits 1-2 (entire
17 documents) contain, reference, and/or describe Waymo's asserted trade secrets or information that,
18 from context, tends to disclose Waymo's asserted secrets, including as misappropriated by
19 Defendants. The information Waymo seeks to seal includes the confidential design and functionality
20 of Waymo's proprietary autonomous vehicle system, including its LiDAR designs, which Waymo
21 maintains as secret. I understand that these trade secrets are maintained as secret by Waymo (Dkt. 25-
22 47) and that the trade secrets are valuable to Waymo's business (Dkt. 25-31). The public disclosure of
23 this information would give Waymo's competitors access to descriptions of the functionality or
24 features of Waymo's autonomous vehicle system. If such information were made public, I understand
25 that Waymo's competitive standing would be significantly harmed.

26 5. Waymo's request to seal is narrowly tailored to those portions of Otto Trucking's
27 Motion and Exhibits 1-2 that merit sealing.

1 I declare under penalty of perjury under the laws of the State of California and the United
2 States of America that the foregoing is true and correct, and that this declaration was executed in San
3 Francisco, California, on October 23, 2017.

4 By /s/ Felipe Corredor

5 Felipe Corredor

6 Attorneys for WAYMO LLC

7
8 **ATTESTATION**

9 In accordance with Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this
10 document has been obtained from Felipe Corredor.

11
12 By: /s/ Charles K. Verhoeven

13 Charles K. Verhoeven